

*Midwest Medical Record Association, Inc.  
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March 21, 2003

By E-Mail Only

Mr. Larry Hartzke  
Office of Legal Counsel  
Department of Health and Family Services  
1 West Wilson Street  
P.O. Box 7850  
Madison, WI 53707-7850

Re: Rules change to Chapter 117.

Dear Mr. Hartzke,

This correspondence is being sent in response to your request to be given data that may prove helpful to determine what it takes to produce a duplicate set of health care records. As we note that there is only one seat on the committee that actually produces duplicate sets of health care records on a daily basis, we hope you will indulge us by allowing us to add to whatever information that seat may offer.

Several of our clients have been gracious enough to give us some detail as to amounts budgeted for the operation of their medical record departments. While we received four budget amounts, due to the limited amount of time we had to produce the numbers, we were only able to conduct a quick time study at three of the four hospitals submitting their budget amounts. Those budget amounts and an analysis of how the budget dollars would translate into a clerical hour are being demonstrated on a worksheet being attached to this e-mail.

The worksheet should demonstrate the budget dollars; a time study detailing tasks performed, with averages for time and number of pages; and a breakout of the volume of media types that we produced copies from last year.

What is not included either in the budget amounts given by the hospitals or even in our time study is a figure for "overhead". It seems from the data requested so far great attention has been placed on what it takes to "produce" a duplicate set of health care records. Our practical experience is that is only part of the process. It would be a great disservice to the provider of the copies to ignore the effort and expenditure necessary to follow up on a request after it has been acted upon. Our

**own corporate figures indicate that an additional 36% needs to be added to the on-site production expenses to allow for such things as legal expenses, collections, software development, tech support, etc. None of the budget figures given would reflect those costs as our ROI service has to build that into our pricing.**

**Would the committee entertain the idea of having a health care provider demonstrate the process of responding to a request? It seems to us that those committee seats that have no first hand knowledge of the process would benefit greatly from such a demonstration.**

**Please feel free to call me if you have any questions.**

**Very truly yours,**

**Dave Jackson  
Vice President**